

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

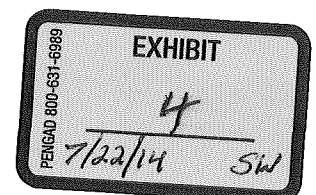
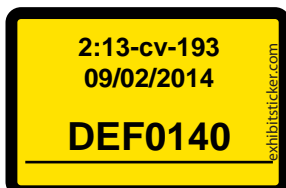
Civil Action No. 2:13-cv-193 (NGR)  
(Consolidated Action)

**DECLARATION OF THE DEPARTMENT OF STATE**

Pursuant to the parties' stipulation, the United States Department of State provides the following declaration pursuant to 28 U.S.C. § 1746, in lieu of oral testimony regarding topics 3 and 6, as set forth in "Defendants' Second Amended Notice of Intention to Take Oral Deposition of the United States Department of State," served on July 15, 2014, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure:

**Response to Topic 3**

The Department of State used information contained in its Passport Records systems to perform the match to the Texas Election Administration Management System (TEAM) database. The Passport Records system, No. State-26, is more particularly described in the System of Records notice found at 76 Fed. Reg. 39466 (Jul. 6, 2011) and available at <http://www.gpo.gov/fdsys/pkg/FR-2011-07-06/pdf/2011-16898.pdf>. The following describes the frequency and process by which the database fields used to conduct the matches performed for this litigation are maintained and updated.



The Travel Document Issuance System (“TDIS”) is the system of issuance for passport products produced in the United States by the Department of State. From a data maintenance point of view, TDIS is the application and database used to enter, edit, and correct the electronic application data up until it reaches a final processing state.<sup>1</sup> Once an application reaches a final processing state in TDIS, the application is transferred through an extract, transfer, and load (“ETL”) process into the Vital Passport Records Repository (“ViPRR”) database system.

Passport Information Electronic Records System (“PIERS”) is a suite of custom Web and desktop applications for managing passport records. It is used by numerous divisions across the Department of State, but only the members of the Record Services branch (CA/PPT/TO/RS) have the necessary role permissions to modify ViPRR records through PIERS.

Correction requests for Records Services arrive through the ‘PIERS-Corrections’ mailbox. From 10/1/2013 through 7/9/2014 there were 648 PIERS corrections. To give this number perspective, there were approximately 13.5 million passport applications processed domestically in 2013. The majority of corrections consisted of changing the status to ‘Issued’ from ‘Not Issued’ for records that did not make it through the ETL process normally. Infrequently, a request will come through the mailbox for a social security number, date of birth or other field correction. These requests consist of, but are not limited to:

- Correcting a record that was discovered by the agency or the applicant to have been data entered incorrectly at the agency in relation to what was on the actual application. This is usually a correction to an old record as the product would have been replaced with a

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<sup>1</sup> Valid application statuses in PIERS are limited to Cancelled, Destroyed, Issued, Lost, Not Issued, Pending, Replaced, Revoked, Stolen or Unknown.

newer product with the correct information on it and the old product destroyed. This correction is performed to allow future searches to find the record by the correct data.

- Correcting the link to the scanned image. Occasionally, pages will become misaligned in the scanning process and the wrong application image will be linked to the electronic record. The Record Services branch will locate the correct image and correct pointer in the electronic record to show the corrected image.

Other corrections may occur as need is determined by the offices of Passport Services or Consular Systems and Technology in order to maintain the data's integrity. These 'one off' corrections will either be handled by Record Services or through a robust governance process that includes an engineering change management ("ECM") board with executive oversight.

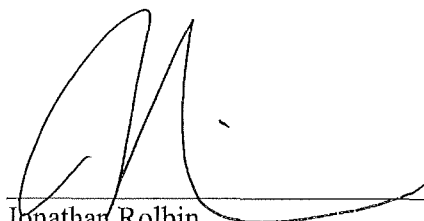
#### **Response to Topic 6**

Pursuant to 22 C.F.R §§ 51.23 and 51.40, a U.S. passport applicant has the burden of establishing both his/her identity and U.S. nationality. New passport applicants must submit a completed and properly executed form DS-11, along with a photocopy of supporting documentation of identity and original or certified copies of evidence of U.S. nationality and all appropriate fees consistent with the instructions on the form. Generally speaking, acceptable evidence of identification includes, but is not limited to, valid government-issued photo identification such as a state-issued driver's license or state-issued identification card. Generally speaking, acceptable evidence of U.S. nationality includes, but is not limited to, a certified U.S. birth certificate, consular report of birth abroad, a certificate of naturalization, or certificate of U.S. citizenship. Previous U.S. passport holders may generally renew an expired passport (within 15 years of the date of issuance and provided that the expired passport was valid for 10

years) by submitting a completed and signed Form DS-82, the previously issued passport, and all appropriate fees consistent with the instructions on the form. For additional details on the application requirements, please refer to the information found in the entirety of Part 51 of Title 22 of the U.S. Code of Federal Regulations, Forms DS-11 and DS-82 and the instructions contained on those, and information available at [www.travel.state.gov](http://www.travel.state.gov).

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

This 21st day of July, 2014.



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Jonathan Rolbin  
Director of Legal Affairs and Law  
Enforcement Liaison  
Passport Services/Bureau of Consular Affairs  
United States Department of State